

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

SHULAMIT BADOUSH

Plaintiff,

vs.

HOLIDAY INN BOSTON-BROOKLINE  
INTERCONTINENTAL HOTELS GROUP  
PLC, ABC CORPORATION, A  
FICTITIOUSLY NAMED COMPANY  
(OWNER-OPERATOR OF PREMISES), DEF  
CORPORATION, (A FICTITIOUSLY  
NAMED COMPANY (PEST CONTROL  
COMPANY),

Defendants

**NOTICE OF REMOVAL**

Case Number:

TO THE CLERK OF THE ABOVE-ENTITLED COURT:

PLEASE TAKE NOTICE that defendants hereby remove to this Court the state court action described below.

I. On July 18, 2007, an action was commenced in the Superior Court of the State of New Jersey, Ocean County, entitled Shulamit Badoush, Plaintiff, vs. Holiday Inn Boston-Brookline Intercontinental Hotels Group PLC, ABC Corporation, A Fictitiously Named Company (Owner-Operator Of Premises), DEF Corporation, (A Fictitiously Named Company (Pest Control Company), Defendants, Docket No. OCN L-2394-07.

II. Defendant, Beacon 1200 Associates LP d/b/a Holiday Inn Brookline and Intercontinental Hotels Group PLC, has not yet been served and received a copy of plaintiff's complaint on July 31, 2007. This Notice is timely.

III. A copy of all process, pleadings and orders served upon defendant in the state court action are attached hereto as Exhibit "A".

IV. This action is a civil action which may be removed to this Court by defendant pursuant to the provisions of 28 U.S.C. §1441(b) in that it is a civil action between citizens of different states and the matter in controversy exceeds the sum of \$150,000, exclusive of interest and costs because the plaintiff is seeking \$1,000,000 in damages.

WHEREFORE, defendant Beacon 1200 Associates LP d/b/a Holiday Inn Brookline and Intercontinental Hotels Group PLC, prays that this action be removed to the United States District Court for the District of New Jersey.

Dated: New York, NY  
August 22, 2007

**SHAFFER GLAZER, LLP**  
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Group PLC

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